

Exhibit 8



Deposition of:
**Jaqueline Moline , M.D., MSc, FACP,
FACOEM**

February 26, 2020

In the Matter of:
**Zimmerman, Linda Vs. Autozone Inc.,
Et Al.**

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Page 1

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES
3 Coordinated Proceeding JCCP NO. 4674
Special title (Rule 3.550) Case No. BC720153

4 LAOSD ASBESTOS CASES

5 LINDA ZIMMERMAN,
6 Plaintiff,
7 vs.
8 AUTOZONE, INC., et al.,
Defendants.

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10 Telephonic Deposition of JACQUELINE MOLINE, MD,
11 MSc, FACP, FACOEM,
12 Taken by Meghan B. Senter,
13 Before Jennifer D. Hamon,
Certified Court Reporter,

14 On Wednesday, February 26, 2020,
15 Beginning at 10:06 a.m. and ending at 1:42 p.m.

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<p>Page 2</p> <p>1 APPEARANCES OF COUNSEL</p> <p>2 For the Plaintiff:</p> <p>3 LEAH KAGAN</p> <p>4 (Via Telephone)</p> <p>5 Simon Greenstone Panatier Bartlett PC</p> <p>6 Suite 540</p> <p>7 3780 Kilroy Airport Way</p> <p>8 Long Beach, CA 90806</p> <p>9 562.590.3400</p> <p>10 lkagan@sgplaw.com</p> <p>11</p> <p>12 For the Defendant Chanel:</p> <p>13 MEGHAN B. SENTER</p> <p>14 (Via Telephone)</p> <p>15 MG+M</p> <p>16 One Canal Place, Suite 3000</p> <p>17 365 Canal Street</p> <p>18 New Orleans, LA 70130</p> <p>19 504.535.2879</p> <p>20 msenter@mglmaw.com</p> <p>21</p> <p>22 For the Defendants Johnson & Johnson and</p> <p>23 Johnson & Johnson Consumer Inc.:</p> <p>24</p> <p>25 JULIA ROMANO</p> <p>26 (Via Telephone)</p> <p>27 King & Spalding</p> <p>28 Suite 1600</p> <p>29 633 West Fifth Street</p> <p>30 Los Angeles, CA 90071</p> <p>31 213.443.4365</p> <p>32 jromano@kslaw.com</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> <p>76</p> <p>77</p> <p>78</p> <p>79</p> 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<p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> <p>76</p> <p>77</p> <p>78</p> <p>79</p> <p>80</p> <p>81</p> <p>82</p> <p>83</p> <p>84</p> <p>85</p> <p>86</p> <p>87</p> <p>88</p> <p>89</p> <p>90</p> <p>91</p> <p>92</p> <p>93</p> <p>94</p> <p>95</p> <p>96</p> <p>97</p> <p>98</p> <p>99</p> <p>100</p> <p>101</p> <p>102</p> <p>103</p> <p>104</p> <p>105</p> <p>106</p> <p>107</p> <p>108</p> <p>109</p> <p>110</p> <p>111</p> <p>112</p> <p>113</p> <p>114</p> <p>115</p> <p>116</p> <p>117</p> <p>118</p> <p>119</p> <p>120</p> <p>121</p> <p>122</p> <p>123</p> <p>124</p> <p>125</p> <p>126</p> <p>127</p> <p>128</p> <p>129</p> <p>130</p> <p>131</p> <p>132</p> <p>133</p> <p>134</p> <p>135</p> <p>136</p> <p>137</p> <p>138</p> <p>139</p> <p>140</p> <p>141</p> <p>142</p> <p>143</p> <p>144</p> <p>145</p> <p>146</p> <p>147</p> <p>148</p> <p>149</p> <p>150</p> <p>151</p> <p>152</p> <p>153</p> <p>154</p> <p>155</p> <p>156</p> <p>157</p> <p>158</p> <p>159</p> <p>160</p> <p>161</p> <p>162</p> <p>163</p> <p>164</p> <p>165</p> <p>166</p> <p>167</p> <p>168</p> <p>169</p> <p>170</p> <p>171</p> <p>172</p> <p>173</p> <p>174</p> <p>175</p> <p>176</p> <p>177</p> <p>178</p> <p>179</p> <p>180</p> <p>181</p> <p>182</p> <p>183</p> <p>184</p> <p>185</p> <p>186</p> <p>187</p> <p>188</p> <p>189</p> <p>190</p> <p>191</p> <p>192</p> <p>193</p> <p>194</p> <p>195</p> <p>196</p> <p>197</p> <p>198</p> <p>199</p> <p>200</p> <p>201</p> <p>202</p> <p>203</p> <p>204</p> <p>205</p> <p>206</p> <p>207</p> <p>208</p> <p>209</p> <p>210</p> <p>211</p> <p>212</p> <p>213</p> <p>214</p> <p>215</p> <p>216</p> <p>217</p> <p>218</p> <p>219</p> <p>220</p> <p>221</p> <p>222</p> <p>223</p> <p>224</p> <p>225</p> <p>226</p> <p>227</p> <p>228</p> <p>229</p> <p>230</p> <p>231</p> <p>232</p> <p>233</p> <p>234</p> <p>235</p> <p>236</p> <p>237</p> <p>238</p> <p>239</p> <p>240</p> <p>241</p> <p>242</p> <p>243</p> <p>244</p> <p>245</p> <p>246</p> <p>247</p> <p>248</p> <p>249</p> <p>250</p> <p>251</p> <p>252</p> <p>253</p> <p>254</p> <p>255</p> <p>256</p> <p>257</p> <p>258</p> <p>259</p> <p>260</p> <p>261</p> <p>262</p> <p>263</p> <p>264</p> <p>265</p> <p>266</p> <p>267</p> <p>268</p> <p>269</p> <p>270</p> <p>271</p> <p>272</p> <p>273</p> <p>274</p> <p>275</p> <p>276</p> <p>277</p> <p>278</p> <p>279</p> <p>280</p> <p>281</p> <p>282</p> <p>283</p> <p>284</p> <p>285</p> <p>286</p> <p>287</p> <p>288</p> <p>289</p> <p>290</p> <p>291</p> <p>292</p> <p>293</p> <p>294</p> <p>295</p> <p>296</p> <p>297</p> <p>298</p> <p>299</p> <p>300</p> <p>301</p> <p>302</p> <p>303</p> <p>304</p> <p>305</p> <p>306</p> <p>307</p> <p>308</p> <p>309</p> <p>310</p> <p>311</p> <p>312</p> <p>313</p> <p>314</p> <p>315</p> <p>316</p> <p>317</p> <p>318</p> <p>319</p> <p>320</p> <p>321</p> <p>322</p> <p>323</p> <p>324</p> <p>325</p> <p>326</p> <p>327</p> <p>328</p> <p>329</p> <p>330</p> <p>331</p> <p>332</p> 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<p style="text-align: right;">Page 42</p> <p>1 Q Do you recall what the substance of 2 those comments were? 3 A Some of it was they wanted us to take 4 out some of the initial -- what we had initially 5 submitted was -- there was some quotation in some 6 of the introduction to the conclusion. They 7 asked that we add a line about whether there was 8 any genetic testing, which we did. 9 There was a -- some clarifications I 10 think on the tables. There were some minor 11 changes. It was nothing that was not -- 12 obviously, it was nothing that prevented it from 13 being published. It was a very constructive 14 review in terms of making it clearer to the 15 reader. 16 Q Understood. I assume that you made 17 those revisions; is that right? 18 A When we were able to, yes. I mean, 19 sometimes the reviewer will suggest things that 20 are not possible to do, and you note that it's 21 not possible to do it. But in general, one tries 22 to be responsive to the reviewers' requests. 23 Q Do you recall any specific request 24 made by the reviewers on this article that you 25 were unable to make?</p>	<p style="text-align: right;">Page 44</p> <p>1 correct? 2 A Correct. 3 Q And because you were a retained expert 4 on each of those 33 cases associated with the 5 paper, you do have a way of identifying each of 6 the 33 individuals described within your 7 published paper; right? 8 A I personally -- yes. I have a way of 9 identifying who is patient 1 or who is patient 10 33. 11 Q And for reasons that you can explain, 12 you will not provide the listing or any 13 information about which specific individual is 14 associated with any given case; correct? 15 MS. KAGAN: I'm sorry. Can you reask 16 the first part of the question? For reasons she 17 can or cannot explain? 18 MS. SENTER: Can. 19 BY MS. SENTER: 20 Q For reasons that Dr. Moline can state 21 in response to my question, Dr. Moline will not 22 identify the specific individuals that are the 23 subject of your paper; correct? 24 A I will not name names in this 25 deposition. That is correct.</p>
<p style="text-align: right;">Page 43</p> <p>1 A No. 2 Q As we go forward, I am 99 percent sure 3 that I know your answers to these questions. I 4 just have to ask them for the record. You have a 5 key for the 33 cases that are included in your 6 paper that associates those 33 cases with 7 specific plaintiffs in talc litigation; is that 8 right? 9 MS. KAGAN: Foundation, vague, and 10 argument as to "you have a fee." 11 THE WITNESS: Are you asking me if I 12 have a way of associating who is who with what's 13 described in the paper? 14 BY MS. SENTER: 15 Q Yes. 16 A Yes. I mean, I don't know if I would 17 call it a key, but yes. 18 Q So the paper talks about 33 different 19 individuals, and those were all -- those 20 individuals were all plaintiffs in litigation; 21 correct? 22 A Yes. 23 Q And for each of those 33 individuals, 24 you have been hired or retained to provide an 25 opinion in association with their litigation;</p>	<p style="text-align: right;">Page 45</p> <p>1 Q And what is the reason that you have 2 that you will not give the identities of the 3 individuals who were used in this paper? 4 A I'm following -- the paper was 5 submitted for IRB approval, Institutional Review 6 Board approval. I was -- it's to protect the 7 privacy of the individuals who we included in the 8 paper with their data in a way that it's not 9 identified in some fashion so that people can't 10 go knocking on their doors or sending them nasty 11 tweets. 12 Q When you submitted for IRB approval, 13 was the approval granted conditionally upon the 14 individuals remaining anonymous? 15 A We described that -- how we would be 16 describing the individuals, and we said that no 17 names would be included in the paper. So to that 18 extent, yes. 19 Q Would it have been possible to submit 20 the scope of this project for IRB approval 21 without the anonymity that you specified in 22 your -- 23 A I don't know. I've never tried that. 24 It's never been my practice in any of the 70 or 25 80 papers that I've published to ever include</p>

<p style="text-align: right;">Page 142</p> <p>1 CERTIFICATE</p> <p>2 STATE OF GEORGIA:</p> <p>3 COUNTY OF COBB:</p> <p>4 I hereby certify that the foregoing</p> <p>5 transcript was taken down, as stated in the</p> <p>6 caption, and the colloquies, questions and</p> <p>7 answers were reduced to typewriting under my</p> <p>8 direction; that the transcript is a true and</p> <p>9 correct record of the evidence given upon said</p> <p>10 proceeding.</p> <p>11 I further certify that I am not a</p> <p>12 relative or employee or attorney of any party,</p> <p>13 nor am I financially interested in the outcome of</p> <p>14 this action.</p> <p>15 I have no relationship of interest in</p> <p>16 this matter which would disqualify me from</p> <p>17 maintaining my obligation of impartiality in</p> <p>18 compliance with the Code of Professional Ethics.</p> <p>19 I have no direct contract with any party</p> <p>20 in this action and my compensation is based</p> <p>21 solely on the terms of my subcontractor</p> <p>22 agreement.</p> <p>23 Nothing in the arrangements made for</p> <p>24 this proceeding impacts my absolute commitment to</p> <p>25 serve all parties as an impartial officer of the</p>	
<p style="text-align: right;">Page 143</p> <p>1 court.</p> <p>2 This the 2nd day of March, 2020.</p> <p>3</p> <p>4</p> <p>5 <i>Jennifer D. Hamon</i></p> <p>6</p> <p>7 JENNIFER D. HAMON, CCR B-2287, RPR</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	